

3.12 Population, Employment, and Housing

This section identifies and describes existing levels of and trends in population, employment, and housing in the City of Inglewood and analyzes the effects that would be caused by development of the Proposed Project. The section contains: (1) a description of the City’s existing population, employment data, and housing stock as well as a description of the Adjusted Baseline; (2) a summary of the regulations related to population, employment, and housing; and (3) an analysis of the potential impacts associated with the implementation of the Proposed Project.

Comments received in response to the NOP for the EIR regarding population, employment, and housing can be found in Appendix B. Any applicable issues and concerns regarding potential impacts related to population, employment, and housing as a result of implementation of the Proposed Project are analyzed within this section.

The analysis included in this section was developed based on Project-specific construction and operational information, along with City population, employment, and housing characteristics under the Adjusted Baseline. Sources of information for population-, employment-, and housing-related estimates include the City of Inglewood General Plan and Housing Element, the U.S. Census American Fact Finder, the California Department of Finance, and the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) and the 2013-2020 Regional Housing Needs Assessment (RHNA).

3.12.1 Environmental Setting

Population

The Project Site is located in the City of Inglewood. The City’s population has varied over the years, reflecting a decrease during the economic downturn in the late 2000s (and the job loss that took place throughout the United States and California) and a more recent increase. In 2000, the City had a population of 112,580, having grown by an average of nearly 0.3 percent per year in the decade from 1990 to 2000.¹ Between 2000 and 2010 the population of the City dropped by an average of nearly 0.3 per year, which was followed by an increase of equal amount from 2010 to 2019. According to the California Department of Finance, the City of Inglewood’s 2019 population is approximately 112,549, essentially the same as its pre-recession population.² According to SCAG’s 2016 RTP/SCS growth forecast, the City is expected to see its population grow to 129,000 people in 2040; this would represent a nearly 0.7 percent annual growth rate from 2019. **Table 3.12-1** summarizes the population trends for the City of Inglewood from 1990 to 2019, and growth forecasts to 2040.

¹ State of California, Department of Finance, E-4 Historical Population Estimates for City, County and the State, 1991-2000, with 1990 and 2000 Census Counts. Sacramento, California, August 2007. Available: www.dof.ca.gov/Forecasting/Demographics/Estimates/E-4/1991-2000/.

² State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019. Sacramento, California, May 2019. Available: www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/.

**TABLE 3.12-1
 TRENDS IN POPULATION GROWTH FOR THE CITY OF INGLEWOOD AND SCAG REGION (1990-2040)**

Year	City of Inglewood			SCAG Region		
	Population	Population Growth ^a	Avg. Annual Percent Growth ^b	Population	Population Growth ^a	Avg. Annual Percent Growth ^b
1990 ^c	109,602	-	-	14,640,832	-	-
2000 ^c	112,580	2,978	0.27%	16,516,703	1,875,871	1.28%
2010 ^d	109,673	-2,907	-0.29%	18,051,534	1,534,831	1.03%
2019 ^d	112,549	2,876	0.26%	19,155,405	1,103,871	0.61%
2040	129,000	16,451	0.70%	22,138,000 ^e	2,982,595	0.74%

NOTES:

- a "Population Growth" considers the delta between the population associated with listed "Year" row and population of that that under the prior "Year" row.
- b "Average Annual Percent Growth" is calculated by dividing the population growth value by the population of the prior comparison year to obtain the overall percent change. The overall percent change is then divided by the number of years this growth represents in order to present a comparable annual change (i.e., 1990-2000 = 10 years, 2010-2018 = 8 years, and 2018 – 2040 = 22 years). For example, population growth from 1990 to 2000 was 26,005. (26,005 population growth / 372,242 population) x 100 = 7% growth over a 10 year period. 7% overall growth/10 years = 0.70% growth per year.
- c 1990 and 2000 data is provided by State of California, Department of Finance, E-4 Historical Population Estimates for City, County and the State, 1991-2000, with 1990 and 2000 Census Counts.
- d 2010 and 2019 data are sourced from State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019.
- e 2040 projected data for the Southern California Association of Governments (SCAG) Region is sourced from SCAG, Regional Transportation Plan Sustainable Communities Strategy 2016-2040. p. 51.

SOURCES:

- State of California, Department of Finance, E-4 Historical Population Estimates for City, County and the State, 1991-2000, with 1990 and 2000 Census Counts. Sacramento, California, August 2007. Available: [HYPERLINK "http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-4/1991-2000/"].
- State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019. Sacramento, California, May 2019. Available: [HYPERLINK "http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5"].
- SCAG, 2016. 2016 RTP/SCS Growth Forecast by Jurisdiction. Available: [HYPERLINK "http://www.scag.ca.gov/Documents/2016%20Draft%20Growth%20Forecast%20ByJurisdiction.pdf"]. p. 1; and
- SCAG, 2016. Regional Transportation Plan Sustainable Communities Strategy 2016-2040. p. 51.

The City of Inglewood is one of eighty communities that form the greater Los Angeles metropolitan area. The City is located within the planning area of SCAG, the Southern California region’s federally designated metropolitan planning organization.³ The SCAG region includes six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Region-wide, the population grew from 14.64 million people in 1990 to 16.52 million in 2000, a growth rate of nearly 1.28 percent per year. From 2000 to 2010, while the population of Inglewood dropped at an average rate of 0.3 percent per year, the region grew at an average rate of 1.03 percent per year. From 2010 to 2019, region-wide population growth slowed to an average of 0.61 percent per year, reaching a total of 19.16 million people in 2019.⁴ As discussed in Section 3.0, Introduction to the Analysis, the RTP/SCS forecasts region-wide growth to nearly 22.14 million as of 2040, which would represent an average growth rate of 0.73 percent per year from 2019, similar to potential citywide growth. Table 3.12-1 summarizes the existing population trends for the SCAG region from 1990 to 2019 and estimated population forecasts to 2040.

³ Southern California Association of Governments, 2019. *About SCAG*. Available: www.scag.ca.gov/about/Pages/Home.aspx [HYPERLINK] Accessed February 10, 2019.
⁴ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019. Sacramento, California, May 2019. Available: [HYPERLINK "http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5"].

Housing

From 1990 to 2019, similar to the population of Inglewood, occupied housing units (or households) within the City reached a peak in 2000 before dropping to 1990 levels in 2010.^{5,6} By 2019, occupied units reached a nearly 30 year high with 36,808 households, in 38,691 units. The total supply of housing units decreased by approximately 22 units over this time. **Table 3.12-2** shows total housing, vacancy rates, households and persons per household within the City of Inglewood and the surrounding SCAG region. As shown in the table, while the number of housing units in the City of Inglewood generally remained stagnant from 1990 to 2019, region-wide housing supply increased from 5.33 million to 6.59 million units.⁷

Employment

According to the U.S. Census, in 2017, there were approximately 51,474 employees in the City.⁸ Of these employees, approximately 24 percent were made up of the management, business, science and arts occupations, 25 percent consisted of the service industry (healthcare support, food preparation, building and grounds cleaning), 30 percent consisted of sales and office jobs, 8 percent were made up of natural resources, construction, and maintenance jobs, and 13 percent consisted of production, transportation, and material moving jobs.⁹

Table 3.12-3 shows existing and forecasted employment in the City and region. Similar to the changes related to the City's households and population, the City's employment decreased in the late 2000s due to the nation-wide economic downturn. As **Table 3.12-3** shows, the employment forecast for the City for 2040 is significantly lower than existing employment in the City as of 2017. The reason is that SCAG's employment forecast for the City was prepared in 2012, at a time when employment levels were depressed during the downturn in the economy. Since that date, City employment has recovered at a rate that exceeds SCAG's forecast. From 2013 to 2017, the City has increased jobs by an estimated 2.13 percent per year. Similar to the City, regional employment decreased in the late 2000s due to the economic downturn, and has increased in the years since then. According to SCAG's RTP/SCS, regional employment is expected to increase over time to an estimated 9,872,000 jobs by 2040, equating to an average annual growth of about 0.59 percent per year from 2017.

⁵ 1990 and 2000 data is provided by State of California, Department of Finance, E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000. Sacramento, California, August 2007. Available: [HYPERLINK "www.dof.ca.gov/Forecasting/Demographics/Estimates/E-8"]. 2010 and 2019 data are sourced from State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019. Sacramento, California, May 2019. Available: www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/.

⁶ Households are defined as an occupied residential unit.

⁷ 1990 and 2000 data is provided by State of California, Department of Finance, E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000. Sacramento, California, August 2007. Available: [HYPERLINK "www.dof.ca.gov/Forecasting/Demographics/Estimates/E-8"]. 2010 and 2019 data are sourced from State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019. Sacramento, California, May 2019. Available: www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/.

⁸ U.S. Census, 2017. *2013-2017 American Community Survey (5-year estimates)*.

⁹ U.S. Census, American Community Survey (ACS), "Table S2401: Occupation by Sex for the Civilian Employed Population 16 Years and Over", 2017 American Community Survey 1-Year Estimates; and ALH Urban & Regional Economics.

**TABLE 3.12-2
 HOUSING UNITS, HOUSEHOLDS, AND HOUSEHOLD SIZE- IN INGLEWOOD AND SCAG REGION (1990 – 2040)**

Year	Inglewood				SCAG Region			
	Total Housing Units ^a	Vacancy Rate ^b	Households ^c	Persons Per Household	Total Housing Units ^a	Vacancy Rate ^b	Households ^c	Persons Per Household
1990 ^d	38,713	6.74%	36,102	2.92	5,329,631	7.43%	4,933,562	2.91
2000 ^d	38,648	4.77%	36,805	3.02	5,722,035	5.86%	5,386,488	3.01
2010 ^e	38,429	5.31%	36,389	2.97	6,327,311	7.65%	5,843,223	3.03
2019 ^e	38,691	4.87%	36,808	3.02	6,592,345	7.68%	6,086,263	3.09
2040	-	-	43,300 ^f	2.98 ^g	-	-	7,17,200 ^h	3.09

NOTES:

- ^a Total housing units are provided in in this column in order to provide a comparative context with vacancy rates and the total number of households.
- ^b "Vacancy Rates" are provided by the California Department of Finance; this rate (VR) refers to the difference between total housing units (HU) and households (H) in order to identify vacant units, which are then divided by the number of housing units HU); as an equation, this is $VR = (HU-H) / HU$.
- ^c Households are defined as an occupied residential unit; Note 2040 data is not available for total housing units.
- ^d 1990 and 2000 data is provided by State of California, Department of Finance, E-4 Historical Population Estimates for City, County and the State, 1991-2000, with 1990 and 2000 Census Counts.
- ^e 2010 and 2019 data are sourced from State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019.
- ^f 2040 projected data for the City of Inglewood is sourced from the SCAG 2016 RTP/SCS Growth Forecast by Jurisdiction. p. 1.
- ^g 2040 Persons Per Household is based on 2040 population, 129,000 identified in Table 3.12-1; (129,000 Persons / 43,300 Households = 2.98 Persons Per Household).
- ^h 2040 projected data for the SCAG Region is sourced from SCAG, Regional Transportation Plan Sustainable Communities Strategy 2016-2040. p. 51.

SOURCES:

State of California, Department of Finance, E-4 Historical Population Estimates for City, County and the State, 1991-2000, with 1990 and 2000 Census Counts. Sacramento, California, August 2007. Available: [HYPERLINK "http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-4/1991-2000"];

State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019. Sacramento, California, May 2019. Available: [HYPERLINK "http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5"];

SCAG, 2016. 2016 RTP/SCS Growth Forecast by Jurisdiction. Available: [HYPERLINK "http://www.scag.ca.gov/Documents/2016%20Draft%20Growth%20Forecast%20ByJurisdiction.pdf"]. p. 1; SCAG, 2016. Regional Transportation Plan Sustainable Communities Strategy 2016-2040. p. 51.; and ESA 2019.

**TABLE 3.12-3
 TRENDS IN EMPLOYMENT GROWTH IN THE INGLEWOOD AND SCAG REGION**

Year	Inglewood			SCAG Region		
	Employment	Employment Growth From Prior Year Listed	Average Annual Percent Growth ^a	Employment	Employment Growth From Prior Year Listed	Average Annual Percent Growth
2000	42,375	-	-	6,948,811	-	-
2010	49,000	6,625	1.56%	8,096,617	1,147,806	1.65%
2013	47,436	-1,564	-1.06%	8,070,271	-26,346	-0.11%
2017	51,474	4,038	2.13%	8,685,134	614,863	1.90%
2040	37,400 ^b	-14,074	-1.19%	9,872,000 ^c	1,186,866	0.59%

NOTES:

- ^c "Average Annual Percent Growth" considers the growth in population value, and divides it by the number of years this growth represents in order to present a comparable annual change; i.e., 1990-2000 = 10 years, 2010-2017 = 7 years, and 2017 – 2040 = 23 years.
- ^b 2040 data for the City of Inglewood is sourced from 2016 RTP/SCS Growth Forecast by Jurisdiction, p. 1.
- ^c 2040 data for the SCAG region is sourced from SCAG, 2016. *Regional Transportation Plan Sustainable Communities Strategy 2016-2040*. p. 51.

SOURCES:

2000 data is provided by U.S. Census, 2000, DP-3-Population Group-Total population: Profile of Selected Economic Characteristics: 2000, Census 2000 Summary File 4 (SF 4) - Sample Data. Available: [HYPERLINK "https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk"];

2010 data provided by 2006-2010 American Community Survey Selected Population Tables; 2013 data provided by 2009-2013 American Community Survey (5-year estimates); 2017 data is provided by U.S. Census, 2017;

2016 RTP/SCS Growth Forecast by Jurisdiction. Available: [HYPERLINK "http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf"]; and

SCAG, 2016. *Regional Transportation Plan Sustainable Communities Strategy 2016-2040*.

As employment has increased and is expected to continue to increase, in turn, unemployment in the region is expected to decrease. Unemployment in the County of Los Angeles was 10.2 percent in 2012, and decreased to 4.7 percent in 2017.^{10,11} Similar to this trend, unemployment in the state was 9.8 percent in 2012 and decreased to 4.8 percent in 2017.

The City has an unemployment rate exceeding that of Los Angeles County and California. According to the California Employment Development Department, the City’s unemployment rate in 2017 was 5.4 percent, higher than the State’s unemployment rate (4.8 percent) and Los Angeles County (4.7 percent).

Existing Project Site and LA Clippers Employment

The Project Site is mostly vacant, and is partially developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well. The Project Site does not contain any residential or dwelling units within the site’s boundaries, and therefore has no permanent resident population. Existing employment at the Project Site is estimated to be approximately 119 people, as estimated below in **Table 3.12-4**.

¹⁰ City of Inglewood, 2013. *City of Inglewood General Plan Housing Element 2013-2021*. p. 2-4.

¹¹ California Employment Development Department, 2017. *Unemployment Rate and Labor Force: Annual Averages Unemployment Rate and Labor Force Data Table*. Available: <https://www.labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html>. Accessed February 12, 2019.

TABLE 3.12-4
ESTIMATED EXISTING PROJECT SITE EMPLOYMENT

Land Use ^a	Size	Generation Rate (Employees Per Square Foot [sf])	Total
Commercial (Fast-Food Restaurant)	1,118 sf	2.24/1,000	2.5
Commercial (Motel)	16,806 sf	1.13/1,000	19.0
Light Manufacturing/Warehouse	28,809 sf	2.69/1,000	77.5
Warehouse	6,231 sf	2.69/1,000	16.8
Commercial (Catering)	1,134 sf	2.24/1,000	2.5
Total			119

NOTES:

a Other Project Site uses include a City water well and vacant land, which do not generate employment.

SOURCE: Inglewood Unified School District, 2018. Commercial/Industrial Development School Fee Justification Study Employment Impacts per sf. p. ES-3. Available: [HYPERLINK "https://www.myiusd.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf"]. Accessed February 12, 2019.

As detailed in Chapter 2, Project Description, the LA Clippers currently maintain approximately 254 employees, which includes approximately 54 basketball operations employees such as players, coaches, and staff, and other employees associated with the practice facilities, and approximately 200 employees in executive management, business operations and various support capacities. These employees currently work at the Clippers team offices in downtown Los Angeles and at their athletic training facilities located in the Playa Vista neighborhood within Los Angeles.

3.12.2 Adjusted Baseline Environmental Setting

Section 3.12, Population, Employment, and Housing, assumes the Adjusted Baseline Environmental Setting as described in Section 3.0, Introduction to the Analysis. The residential, office, retail, and entertainment uses associated with the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects would result in changes to the City’s population, employment, and housing stock. **Table 3.12-5** details the land uses and associated residential and employment generation for the HPSP Adjusted Baseline projects. Overall, the HPSP Adjusted Baseline projects would generate an increase of approximately 9,470 jobs and 314 residential units. By using the City’s average household size of 3.04 persons per household,¹² the addition of 314 residential units would generate an estimated 955 people. Overall, as shown in **Table 3.12-6**, under Adjusted Baseline conditions, the City has a residential population of 113,491 persons, employment of 60,944 jobs, and a housing stock of 39,005 units.

¹² U.S. Census, American Community Survey (ACS), "Table B25032: Tenure by Units in Structure", "Table B25038: Tenure by Year Householder Moved Into Unit", and "Table B25039: Median Year Householder Moved Into Unit by Tenure", 2017 American Community Survey 1-Year Estimates; and ALH Urban & Regional Economics.

**TABLE 3.12-5
 HPSP ADJUSTED BASELINE PROJECTS POPULATION, EMPLOYMENT AND HOUSING CHARACTERISTICS**

Land Use	Size	Generation Rate	Employee Population	Residential Population
Stadium ^a	70,000 seats	-	6,000 ^d	
Performance Venue ^b	6,000 seats	2.24 employee /1,000 sf	683	
Retail ^c	518,077 sf	2.24 employee/1,000 sf	1,161	
Office ^c	466,000 sf	3.49/1,000 sf	1,626	
Housing Unit	314 units	3.04 persons/unit		955
Total			9,470	955

NOTE:

- ^a “Stadiums” are not common land uses, and the City and surrounding jurisdictions do not have an existing employment generation rates for this use. Therefore, the employment total for the stadium was based on that provided in the San Francisco 49ers Stadium, which had a similar seat count (68,500 seats). See City of Santa Clara, 2009. *The 49ers Stadium Project EIR*. p. 176.
- ^b “Performance Venues” are not common land uses, and the City and surrounding jurisdictions do not have an existing employment generation rates for these uses. Consistent with the City’s Hollywood Park Redevelopment Draft Environmental Impact Report, and to be conservative, the “Performance” land use is assumed to use the “Retail Use” for the City generation rates. The square footage for this Performance Venue was based off of the Proposed Project, which has approximately triple the seat count of the HPSP performance venue (18,000 seats or 915,000 sf). Thus, this analysis assumes square footage for Performance Venue is that of the Proposed Project divided in by three, to become 305,000 sf.
- ^c Based on employment generation factors from Inglewood Unified School District, 2018 Developer Fee Justification Study. Table 4. Assumes employee generation rate of 2.24 employee per square foot for Retail and Service uses, and 3.49 employee per square foot for Office uses.
- ^d Anticipated Peak Stadium employment under HPSP is provided by Appendix K, Transportation Data. It is assumed that the vast majority of these jobs are event-related employment and were estimated for the purposes of transportation analysis. Although details are not available to the City, an assessment of full time equivalent employment at the Stadium would be materially less than the total of 6,000

SOURCES:

City of Santa Clara, 2009. *The 49ers Stadium Project EIR*. Available: [HYPERLINK "http://santaclaraca.gov/home/showdocument?id=12770"]. Accessed February 12, 2019;

City of Inglewood, 2008, Hollywood Park Redevelopment Draft Environmental Impact Report; and Inglewood Unified School District, 2018. Commercial/Industrial Development School Fee Justification Study Employment Impacts Per Sf. P. ES-1. Available: [HYPERLINK "https://www.myiusd.net/wp-content/uploads/2018/05/FSCID_Inglewood_FN.pdf"]. Accessed February 12, 2019.

**TABLE 3.12-6
 HPSP ADJUSTED BASELINE CONDITIONS**

Use	Existing Setting ^a	HPSP Adjusted Baseline Projects	Total
Population	112,549	955	113,504
Housing	38,691	314	39,005
Employment	51,474	9,470	60,944

NOTE:

- ^a Population and Housing are incorporated from Table 4.12-1 and Table 4.12-2, and Employment uses data from Table 4.12-3.

SOURCE: ESA, 2019

3.12.3 Regulatory Setting

Federal

There are no federal laws, regulations, plans, or policies related to population, employment, and housing issues that are applicable to the Proposed Project.

State

California Housing Element Requirement

California law (Government Code Section 65580, et seq.) requires cities and counties to include as part of their General Plans a housing element to address housing conditions and needs in the community. Housing elements are prepared approximately every five years (eight following implementation of SB 375), following timetables set forth in the law. The housing element must identify and analyze existing and projected housing needs and “make adequate provision for the existing and projected needs of all economic segments of the community,” among other requirements. The City’s Housing Element was updated in 2013 (adopted in January of 2014), and is detailed below.

Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The current planning period, 2013 to 2021, is considered the 5th RHNA Planning Cycle. As of fall 2017, SCAG initiated planning for the 6th RHNA Planning Cycle began; this cycle covering the 2021 to 2029 period is expected to be adopted in October 2020.¹³ Communities use the RHNA in land use planning, prioritizing local allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and housing growth. The RHNA does not necessarily encourage or promote growth, but rather is designed to enable communities to anticipate growth, so that collectively the region and sub-region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity and fair share housing needs.

The RHNA determines the “fair share” allocation required of each jurisdiction; that is, the number of housing units for each household income level that should be provided in each jurisdiction to meet both current needs and projected needs. **Table 3.12-7** shows the City of Inglewood’s 2013-2021 RHNA by income level. The RHNA determined that the City currently needs to provide a total of 1,013 new housing units, and of these 400 need to be affordable units for low and very low income households in order to satisfy the City’s share of regional housing needs for the current planning period.¹⁴

¹³ Southern California Association of Governments, 2017. Regional Housing Needs Assessment Frequently Asked Questions. November 20, 2017. Available: [HYPERLINK "www.scag.ca.gov/Documents/RHNA-2017factsheet.pdf"].

¹⁴ City of Inglewood, 2013. *City of Inglewood General Plan Housing Element 2013-2021*. p. 2-29.

**TABLE 3.12-7
 INGLEWOOD REGIONAL HOUSING NEEDS ASSESSMENT (2013-2021)**

Income Group	Units	Percent of Total
Very Low (0-50 Percent AMI) ^a	250	25
Low (51-80 Percent AMI)	150	15
Moderate (81-120% AMI)	167	17
Above Moderate (Over 120 Percent AMI)	446	44
Total	1,013	100

NOTES:

^a AMI = Area Medium Income.

SOURCE: City of Inglewood, 2013. City of Inglewood General Plan Housing Element 2013-2021. p. 2-29.

SCAG Regional Comprehensive Plan

As part of its past planning obligations, SCAG prepared the Regional Comprehensive Plan (RCP), the most recent of which was the 2008 RCP released on February 9, 2009. The RCP was an advisory plan prepared by SCAG that addressed significant regional issues such as traffic/ transportation, housing, water, and air quality. The RCP served as an advisory document to local agencies within the Southern California region for information and voluntary use for the preparation of local plans and handling local issues of regional significance. The RCP presented a vision of how Southern California could balance resource conservation, economic vitality, and quality of life. The plan identified voluntary best practices to approach growth and infrastructure challenged in an integrated and comprehensive way. The RCP further included goals and outcomes to measure progress toward a more sustainable region.¹⁵ Because the RCP served as an advisory document for local jurisdictions on their planning-level efforts and not for project-level analysis, it would not be applicable to the Proposed Project and is not evaluated further in this EIR.

SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

As previously detailed, the City is located within the planning area of SCAG, the Southern California region’s federally designated metropolitan planning organization. On April 7, 2016, SCAG’s Regional Council adopted the 2016-2040 RTP/SCS. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The plan charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The RTP/SCS includes land use policies to guide the region’s development, including planning for additional housing and jobs near transit, and planning for changing demand in types of housing. One goal of the 2016 RTP/SCS is to encourage land use and growth patterns that facilitate transit and active transportation.

¹⁵ Southern California Association of Governments, Regional Comprehensive Plan. Available: [HYPERLINK "http://scag.ca.gov/NewsAndMedia/Pages/RegionalComprehensivePlan.aspx"]. Accessed May 2019.

Local

City of Inglewood General Plan

The City of Inglewood General Plan sets forth goals, objectives, and policies for the future development of the City and designates the location of desired future land uses within the City and therefore the Project Site. A summary of the General Plan Elements is provided under Section 3.10, Land Use and Planning. Specific elements that apply to population, employment and housing relevant to the Proposed Project are described below.

Housing Element

The City of Inglewood General Plan Housing Element 2013-2021, adopted on January 28, 2014, presents a framework upon which the City can implement a comprehensive housing program from 2013 to 2021 to provide its residents with decent and affordable housing. The program established policies to create or preserve quality residential neighborhoods. The Housing Element identifies current and future housing needs and established policies and programs to mitigate or correct housing deficiencies.

The Project Site currently does not include any housing, nor is it zoned for residential, or identified as a site for housing within the Housing Element. Because of this setting and because the Proposed Project would not construct any housing, goals or policies identified in the General Plan Housing Element are not applicable to the Proposed Project.

Land Use Element

A. General:

Goal: Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.

Goal: Develop a land use element that facilitates the efficient use of land for conservation, development and redevelopment.

Goal: Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.

C. Commercial:

Goal: Create and maintain a healthy economic condition within the present business community and assist new business to located within the City.

Goal: Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.

Goal: Continue to promote the development of high quality commercial/office space at appropriate locations within the City through the redevelopment process.

Goal: Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.

D. Industrial:

Goal: Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.

Goal: Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek the addition of new firms that are environmentally non-polluting.

Goal: Increase the industrial employment opportunities for the city's residents.

3.12.4 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for analysis of impacts to population, employment, and housing. The following thresholds of significance are consistent with CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Methodology and Assumptions

The following analysis is based on Project-specific construction and operational information along with City population, employment, and housing characteristics under the Adjusted Baseline. Sources of information for population-, employment-, and housing-related estimates include the City of Inglewood General Plan and Housing Element, U.S. Census American Fact Finder, the California Department of Finance, SCAG RTP/SCS,¹⁶ and the RHNA.

The information contained in this chapter is used as a basis for analysis of project and cumulative impacts in the technical sections in Chapter 3 of this EIR. However, changes in population and housing, in and of themselves, are social and economic effects and under CEQA are not physical effects on the environment. CEQA provides that economic or social effects are not considered significant effects on the environment unless the social and/or economic effects are connected to physical environmental effects. A social or economic change related to a physical change may serve as a linkage between the Proposed Project and a physical environmental effect, or may be considered in determining whether the physical change is significant (CEQA Guidelines section 15382). The direction for treatment of economic and social effects is stated in section 15131(a) of the CEQA Guidelines:

¹⁶ Note that, because the SCAG RTP/SCS is a regional tool to plan for possible future growth, it does not represent a growth ceiling, or limit.

“Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.”

Impacts and Mitigation Measures

Impact 3.12-1: Construction and operation of the Proposed Project could induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Less than Significant)

Construction Impacts

The Proposed Project would generate temporary employment opportunities during the Project-construction phase. Construction-related jobs generated by the Proposed Project would likely be filled by employees within the construction industry within the City of Inglewood and the greater Los Angeles County region. In 2017, approximately 5 percent of the City’s employed population was based in the construction industry.¹⁷ Construction industry jobs generally have no regular place of business and many construction workers are highly specialized (i.e., crane operators, steel workers, masons, etc.). Thus, construction workers commute to job sites throughout the region that may change several times a year dictated by the demand for their specific skills. The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process. For these reasons, employment opportunities associated with construction of the Proposed Project would not likely result in any measurable relocation of construction worker households to the vicinity of the Project Site. Therefore, impacts related to unplanned population growth due to construction of the Proposed Project would be **less than significant**.

Operational Impacts – Employment Growth

Construction and operation of the Proposed Project would eliminate the current uses at the Project Site, which are estimated to provide approximately 119 jobs. The Proposed Project would generate approximately 768 permanent jobs at the Project Site, a net increase of 649 jobs. Specifically, as detailed in Chapter 2, Project Description, the LA Clippers currently maintain approximately 254 permanent employees, which includes approximately 54 basketball operations employees such as players, coaches, and staff, and approximately 200 employees in executive management, business operations and various support capacities. These employees currently work at the Clippers team offices in downtown Los Angeles, and at the practice and training facility in Playa Vista, and would relocate to the Project Site. The Proposed Project would also result in an estimated increase of 75 permanent employees to provide operations and management

¹⁷ U.S. Census, American Community Survey (ACS), "Table S2401: Occupation by Sex for the Civilian Employed Population 16 Years and Over", 2017 American Community Survey 1-Year Estimates; and ALH Urban & Regional Economics.

services for the Arena and 439 permanent employees in other uses within the Proposed Project. A complete breakdown of Proposed Project permanent employment is provided in Table 2-4.

In addition to the increase in permanent employment, there would be part time employment for employees to support an average of approximately 143 arena and/or plaza events throughout the year; depending on the type of event, such event employment could range from 25 to 1,320 persons (see description of events and event-related employment in Table 2-3). As described in **Table 3.12-8**, based upon the anticipated number of events and assuming 4 hours of employment for each event, total event employment would be equal to an additional 225 full time jobs. Combined with the 768 permanent jobs, the Proposed Project would result in a total of 993 full-time equivalent jobs, a net increase of 874 jobs over Adjusted Baseline conditions.¹⁸

**TABLE 3.12-8
 PROPOSED IBEC EVENT EMPLOYMENT FULL TIME EQUIVALENCY**

Event Type	Number of Events	Employees/Event	Total Employee Days
NBA	49	1,200	58,800
Concerts – Large	8	1,120	8,960
Concerts – Medium	10	795	7,950
Concerts – Small	12	530	6,360
Family Shows	20	530	10,600
Other Events	35	480	16,800
Corporate/Civic	100	25	2,500
Plaza Events	16	25	400
Total PT Employee Days			112,370
Estimated FT Employee Days^a			56,185
Estimated FT Employee Equivalent^b			225

NOTES:
 a Assumes 4 hours per event
 b Assumes 250 work days per year
 Source: ESA, 2019

When accounting for the removal of existing uses, the Proposed Project would result in an increase of approximately 874 full time jobs within the City. The Proposed Project net new employment would increase employment in the City from 60,944 under the Adjusted Baseline to approximately 58,718 with the Proposed Project.¹⁹

¹⁸ This net increase accounts for loss of estimated 119 existing onsite jobs.
¹⁹ The employment increase is based on the Adjusted Baseline Environmental Setting of 9,470 more jobs (see Table 3.12-5) plus the existing setting of 51,474 jobs, for a total of 60,944 jobs (see Table 3.12-6). The Adjusted Baseline employment includes approximately 6,000 jobs associated with the operation of the NFL Stadium. It is assumed that the vast majority of these jobs are event-related employment estimated for the purposes of transportation analysis. Although details are not available to the City, an assessment of full time equivalent employment at the Stadium would be materially less than the total of 6,000.

As is discussed above under Environmental Setting, in 2017 total employment in the City of Inglewood exceeded that projected by SCAG RTP/SCS for 2020, as well as employment projections through 2040,²⁰ due in large part to the SCAG projection taking place during the economic downturn of the Great Recession. Thus, the 874 net new jobs added as a result of the Proposed Project would represent employment growth beyond that forecast for the City.²¹ Nevertheless, the evaluation of physical environmental effects presented in this Draft EIR is based on existing conditions adjusted by actual projects that have been proposed in the vicinity, considered in light of baseline service and infrastructure capacity, as described throughout sections of Chapter 3 of this Draft EIR (in particular, see discussions of impacts in sections 3.13, Public Services; 3.14, Transportation and Circulation; 3.15, Utilities and Service Systems; and related sections 3.2, Air Quality; 3.5, Energy Demand and Conservation; 3.7, Greenhouse Gas Emissions; and 3.11, Noise and Vibration). Therefore, the increase in employment in the City over past projections would not result in any significant physical environmental impacts not otherwise disclosed in this Draft EIR.

The City of Inglewood General Plan has several goals and policies to foster redevelopment of infill sites that would support healthy economic development. In particular, the following General Goal appears in the Land Use Element:

Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.²²

As addressed under Section 2.4, Project Site Existing Conditions and Section 3.10, Land Use and Planning, the Project Site is intended to support employment uses and the Proposed Project would add a net new total of 874 full time equivalent jobs, consistent with the economic development and employment goals of the City of Inglewood General Plan.

As described above, and in analyses in Chapters 3.2 Air Quality, 3.7, Greenhouse Gas Emissions, 3.10, Land Use and Planning, 3.14, Transportation, the Proposed Project, an infill project proposed to be constructed and operated on the Project Site, in an area that is served by existing infrastructure, including transit, would be consistent with the goals and policies of the SCAG 2016 RTP/SCS. Those goals and policies were informed by SCAG's projections of demographic characteristics of the region. Further, although the employment in the Proposed Project would add to the City's employment base that has grown beyond that projected by SCAG in light of past economic conditions, such employment growth would not result in any significant physical environmental impacts not otherwise disclosed in this Draft EIR. For the reasons discussed above, the impact of the Proposed Project on employment would be considered **less than significant**.

²⁰ 2016 RTP/SCS Growth Forecast by Jurisdiction, p. 1. See also, Table 3.12-3.

²¹ Although not an environmental issue, the unemployment rate in the City suggests that the new jobs can be accommodated by existing workers in the City and region.

²² City of Inglewood General Plan, Land Use Element, Section II, Statement of Objectives, p. 6.

Operational Impacts – Housing and Residential Population Growth

The Project Site is currently developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well and related facilities. The Project Site does not contain any housing units within the site's boundaries, and therefore has no existing permanent resident population. The Proposed Project would not include housing uses, and thus would not directly increase the residential population of the City beyond that projected based on the existing and future housing stock. Therefore, the Proposed Project would not directly induce substantial unplanned population growth in the City, and **no impact** would occur.

The RHNA concludes that the City must provide a total of 1,013 new housing units, and of these 400 need to be affordable units for low and very low income households in order to satisfy the City's share of regional housing needs for the current planning period. None of these units, however, are expected to be provided at the site of the Proposed Project. For this reason, the Proposed Project would not interfere with the City's ability to meet its RHNA obligations, and **no impact** would occur.

Mitigation Measures

None required.

Impact 3.12-2: Construction and operation of the Proposed Project could displace substantial numbers of existing people or housing units necessitating the construction of replacement housing elsewhere. (Less than Significant)

Direct Displacement

The Project Site is currently developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well and related facilities. The Project Site does not contain any residential or dwelling units, and therefore has no existing permanent resident population. For this reason, no residents would be directly displaced as a result of the Proposed Project.

Existing businesses would be displaced. The up to 119 employees associated with existing businesses are reasonably assumed to have housing in the City or region. Based on the availability of land suitable for relocation, these businesses should be able to locate elsewhere in the region. For this reason, there is no evidence that employees at these existing businesses would have to move, or that the displaced businesses would generate the need for new housing. The Proposed Project would therefore not displace substantial numbers of existing people or housing

units necessitating the construction of replacement housing elsewhere.²³ Therefore, this impact is considered **less than significant**.

Indirect Displacement

Several comments on the Notice of Preparation requested that the City consider the potential for the Proposed Project to indirectly cause displacement of housing and residents as a result of it causing the process of gentrification. The City undertook a study to determine if there is evidence to suggest that gentrification and indirect housing displacement are foreseeable socioeconomic effects pursuant to development of the Proposed Project (see **Appendix S**).²⁴

As described above, in general CEQA does not require analysis of socioeconomic issues such as gentrification, displacement, environmental justice, or effects on “community character.” The CEQA Guidelines state, however, that while the economic or social effects of a project are not appropriately treated as significant effects on the environment, it is proper for an EIR to examine potential links from a Proposed Project to physical effects as a result of anticipated economic or social changes.

Gentrification is a widely studied and discussed process. Although there is no single definition for the term, the process of gentrification is commonly perceived to be an influx of new, higher-income residents, into a traditionally low-income neighborhood. Displacement has been defined as the process that occurs “when any household is forced to move from its residence by conditions which affect the dwelling or immediate surroundings, and which:

1. are beyond the household’s reasonable ability to control or prevent;
2. occur despite the household’s having met all previously-imposed conditions of occupancy; and
3. make continued occupancy by that household impossible, hazardous or unaffordable.”²⁵

Academic studies conclude that the process of gentrification frequently has both positive and negative effects depending on specific neighborhood characteristics. These studies also show that the link between the process of gentrification and the displacement of existing residents is tenuous and difficult to demonstrate.

In considering the potential for gentrification and displacement effects associated with the Proposed Project, it is notable that a series of land use changes have been occurring in Inglewood, set in motion as many as 10 years ago in 2009. Some of these changes, especially the HPSP and Transit Oriented Development plans, are indicative of City expectations and desires for growth and new development. These plans and investments have been pursued because they are

²³ For additional discussion related to growth-inducing effects or urban decay, refer to Chapter 4, Other CEQA Required Considerations.

²⁴ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019.

²⁵ Miriam Zuk, Ariel H. Bierbaum, Karen Chapple, Karolina Gorska, and Anastasia Loukaitou-Sideris, “Gentrification, Displacement, and the Role of Public Investment.” Available: [HYPERLINK "https://journals.sagepub.com/doi/abs/10.1177/0885412217716439"]. Published in Journal of Planning Literature, 2018, 33(I).

perceived as having an overall benefit on the City. There is a concern that such plans and investments may result in higher property costs or rents, which in turn could displace existing, lower-income residents. Predicting the extent to which such displacement may occur is, however, extremely difficult.

The City's report acknowledged that when looking at residential pricing data since the end of the Great Recession, both median rents and sales prices have been increasing in Los Angeles County's cities and places. These increases coincide with the strengthening economy countywide and increasing housing demand resulting from the inability of regional housing supply to keep pace with demand. As an example of the strengthening economy, in 2011 Los Angeles County added 42,700 jobs. By 2013 the annual increase was 117,000 jobs, and over the four-year period 2013 through 2016, nearly 400,000 jobs were added in Los Angeles County, for a 9 percent increase over the 2012 job base of 4.38 million jobs. Over the same period, the unemployment rate in Los Angeles County declined from a high of 12.5 percent in 2010 to 4.7% in 2018.²⁶

The level of economic activity has resulted in increased demand for housing and associated increases in housing costs in Inglewood, as well as throughout Los Angeles County. Inglewood has long been one of the more affordable places to live in Los Angeles County. In 2015, rental housing in 79% of the cities and places in Los Angeles County were more expensive than Inglewood. Between 2015 and 2019, Inglewood experienced one of the fastest rates of increased rents in the County, with a 39 percent increase in rents, similar to the rates of increase of rents in Long Beach, Hawthorne, Bellflower, and Burbank. Despite the rate of increase, in 2019 Inglewood remains more affordable than 69 percent of the cities and places in Los Angeles County.²⁷ In tracking the price increases, there were no discernable spikes in housing costs (rents or sales prices) in the time periods following the announcement of the NFL Stadium or the Proposed Project; instead, around the periods when the NFL Stadium and the Proposed Project became public knowledge, rents and prices in Inglewood increased at more or less the same rate they have increased throughout the last decade.²⁸

The City's report examined numerous studies of the effects of sports facilities on property values and other effects that can be part of gentrification. The report concludes that neither the gentrification literature nor an analysis of housing cost changes over time provide evidence that development of a professional sports stadium or arena like the Proposed Project causes or contributes to gentrification that could result in physical displacement of existing residents. As a result of a lack of evidence to connect the Proposed Project to gentrification and related displacement that could result in the need for the construction of replacement housing, this impact is **less than significant**.

²⁶ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 35.

²⁷ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 32.

²⁸ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 37.

Mitigation Measures

None required.

Cumulative Impacts

The geographic scope of analysis for cumulative impacts related to population, employment, and housing includes those past, present, and reasonably foreseeable cumulative projects within the boundaries of the City of Inglewood. Future cumulative increases in employment and population as a result of development included in the cumulative project list is presented in **Table 3.12-9**.

**TABLE 3.12-9
 CUMULATIVE INCREASES IN POPULATION AND EMPLOYMENT**

Place/Land Use	Square Footage/ Units	Employees per KSF/ Population/Unit	Total Employment/ Population
Cumulative List			
Retail/Commercial	1,903,815 sf	2.24/1,000 sf	4,265 employees
Office	8,675,487 sf	3.49/1,000 sf	30,277 employees
Industrial/Warehouse/Data Center	2,070,210 sf	2.7/1,000 sf	5,590 employees
Hotel	2,430 rooms	1/1,000 sf	2,430 employees
Schools	6,401 students	1/10 students	640 employees
Total Employment			43,202 employees
Residential	9,315 units/beds	2.97/unit	27,666 persons
City of Inglewood			
Retail/Commercial	653,871 sf	2.24/1,000 sf	1,465 employees
Office	3,567,314	3.49/1,000 sf	12,450 employees
Industrial/Warehouse/Data Center	241,111 sf	2/.71,000 sf	651 employees
Hotel	424 rooms	1/1,000 sf	424 employees
Schools	0	1/10 students	0 employees
Total Employment			14,990 employees
Residential	3,091	2.97/unit	9,180 persons

Source: ESA, 2019

Impact 3.12-3: Construction and operation of the Proposed Project, in conjunction with other cumulative projects, could contribute to cumulative substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure). (Less than Significant)

Employment Growth

The Proposed Project would generate an estimated operational employment of approximately 874 employees. Future growth from projected employment generating uses identified by the cumulative project list (see Table 3.0-2) would result in approximately 14,990 jobs within Inglewood. Together, the Proposed Project, HPSP Adjusted Baseline, and cumulative project list employment is estimated to be 25,334 jobs (874 + 9,470 + 14,990 = 25,334).²⁹ Added to existing 2017 employment conditions of 51,474 jobs, the City would have estimated employment of 76,808 jobs under cumulative conditions.

With or without the Proposed Project, the City of Inglewood's cumulative employment would exceed SCAG RTP/SCS employment projections through 2040. As noted above, the exceedance is largely attributable to the fact that SCAG's RTP/SCS employment projections were prepared in 2012, in the wake of severe economic downturn that commenced in 2008. Since then, employment in the City has largely recovered to its pre-recession levels. As described above, the difference in future estimated employment does not represent an inconsistency with the goals and policies of the 2016 RTP/SCS physical effects of additional employment are described in other sections of this Draft EIR. In and of itself, exceedance of regional employment projections does not represent a significant cumulative impact.

Housing and Residential Population Growth

The Proposed Project would not include housing units, and would thus, not directly increase the residential population or number of households of the City. The Proposed Project would therefore not contribute to cumulative housing and residential population growth within the City. While cumulative population and housing growth would result in increased demand for public services, and utilities and service systems; the physical effects of these future conditions are addressed in other sections of this Draft EIR. Further, Chapter 4 of the Draft EIR includes further discussion of the potential for growth inducement as a result of the Proposed Project.

For all of these reasons, there would be no significant cumulative impact. This impact would be **less than significant**.

Mitigation Measures

None required.

²⁹ The Adjusted Baseline employment includes approximately 6,000 jobs associated with the operation of the NFL Stadium. It is assumed that the vast majority of these jobs are event-related employment estimated for the purposes of transportation analysis. Although details are not available to the City, an assessment of full time equivalent employment at the Stadium would be materially less than the total of 6,000.

Impact 3.12-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could displace substantial numbers of existing people or housing units necessitating the construction of replacement housing elsewhere. (Less than Significant)

Direct Displacement

Because the Proposed Project would not directly displace any people or housing units, it could not contribute to cumulative displacement of a substantial number of existing people or housing units necessitating the construction of replacement housing elsewhere. Therefore, the Proposed Project would not contribute to a cumulative impact.

Indirect Displacement

As discussed under Impact 3.12-2, above, a significant indirect displacement impact would occur if the Proposed Project, in conjunction with Adjusted Baseline projects and other cumulative development, would cause the process of gentrification and result in displacement of substantial existing population or housing units resulting in the need for construction of new residential units.

In addition to the Proposed Project and the HPSP Adjusted Baseline projects, cumulative development presented in Section 3.0, Table 3.0-2, would include 145 cumulative projects that would add 9,315 housing units/beds, 8,675,487 sf of office space, 1,903,815 sf of retail and other commercial space, 2,070,210 sf of industrial/warehouse/data center space, 2,430 hotel rooms, and schools with a capacity of 6,401 students, as well as the Inglewood Transit Connector. Of this total, only 33 projects are located in the City of Inglewood, representing a total development of approximately 3,091 residential units, 443,059 sf of commercial and industrial uses, 451,923 sf of retail uses, 3,567,314 sf of office uses, 424 hotel rooms, 30,000 sf of civic center uses, and approximately 13 acres of open space. Of these 33 cumulative projects, five (Cumulative Projects 53, 54, 65, 67, and 73) are located within South Inglewood (District 4), and would result in the construction of approximately 2,192 residential units, 371,923 sf of retail uses, 3,567,314 sf of office uses, 424 hotel rooms, 30,000 sf of miscellaneous uses, and approximately 13 acres of open space.

This combination of the Proposed Project, Adjusted Baseline projects, and cumulative development would add housing units and employment in the City and surrounding areas, could increase demand for housing in the City of Inglewood, and would expand both public services and transit opportunities. Taken together, this development and related investments could contribute to increased housing costs at existing residences. The Proposed Project would increase employment opportunities in the City and, as such, could contribute to this larger trend.

The City's report acknowledged that when looking at residential pricing data since the end of the Great Recession, both median rents and sales prices have been increasing in Los Angeles County's cities and places. These increases coincide with the strengthening economy countywide and increasing housing demand resulting from the lack of housing supply region-wide. As an

example of the strengthening economy, in 2011 Los Angeles County added 42,700 jobs. By 2013 the annual increase was 117,000 jobs, and over the four-year period 2013 through 2016, nearly 400,000 jobs were added in Los Angeles County, for a 9% increase over the 2012 job base of 4.38 million jobs. Over the same time period, the unemployment rate in Los Angeles County declined from a high of 12.5 percent in 2010 down to 4.7 percent in 2018.³⁰

As described above, the residential pricing data indicate that both median rents and sales prices have been increasing in Los Angeles County's cities and communities, including the City of Inglewood. In 2015, Inglewood was the fourth most affordable city in Los Angeles County, out of a total of 19 reported by Zillow. By 2019, Inglewood was the 17th most affordable city, out of a total of 55 cities and places reported. While the absolute affordability rank decreased, relative to the larger set of cities and communities, the proportional increase is more muted. In 2015, 79 percent of the cities and communities were more expensive than Inglewood. In 2019, this percentage had decreased to 69 percent.³¹ In other words, in terms of affordability, in 2015 Inglewood was in the 21st percentile, and in 2019 Inglewood was in the 31st percentile. Thus, the general trend is that Inglewood is, compared to other cities and communities in the region, becoming somewhat less affordable, although it remains significantly more affordable than the average city or community.

These increases coincide with the strengthening economy and increasing housing demand resulting from the general perception of a lack of housing supply region-wide. Although the City is unable to estimate with precision, the consequences of the regional lack of housing supply and increases in housing costs, these consequences could include displacement of current rental housing tenants, especially those that are low income households. Such displacement, if it were to occur, could result in such households looking for housing in lower cost parts of the Los Angeles region, and could further result in the construction of new housing units in these areas. Although it would be speculative to estimate the quantity or location of new housing that could be constructed to meet the needs of displaced households, it is reasonable to conclude that such effects, if they occur, could result in physical environmental impacts. Thus, this cumulative impact is considered **potentially significant**.

Where a potentially significant cumulative impact is identified, CEQA requires a determination of whether the Proposed Project contribution to the cumulative impact is "considerable." In evaluating the contribution of the Proposed Project to this potentially significant cumulative impact, a relevant question is whether the prospect of the future NFL Stadium or the Proposed Project has heretofore contributed to these increases in housing costs. Looking back to early 2015 when the NFL Stadium was approved indicates that Inglewood's median rents and median home prices did not exhibit a measurable spike relative to neighboring cities. Especially in the year after the announcement of the NFL Stadium project, the change in median rents and median home

³⁰ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 35.

³¹ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 30.

prices were in the range of those in nearby cities.³² This evidence suggests that the change in median rents is attributable to the broader region and economy, rather than to a specific project – even a project as large in scope as the NFL Stadium project.

Further, Inglewood did not experience a spike in median rents or sales prices immediately after the June 2017 IBEC proposal announcement. Nevertheless, rents did trend upwards in 2018 compared to neighboring areas, and this increase has continued in 2019 at the same level as in early 2018.³³

The lack of market effect as a result of the announcement of the NFL Stadium in 2015 and the Proposed Project in 2017 support the conclusion that factors other than the presence of sports venues has driven recent increases in housing prices in Inglewood. Rather, while the Proposed Project could have some minor, indistinguishable contribution to increased land values and related housing prices in the vicinity of the Project Site, the evidence suggests that increases in housing costs in Inglewood are instead more attributable to the strong economy in Los Angeles County. In fact, over the four-year period 2013 through 2016, nearly 400,000 jobs were added in Los Angeles County, for a 9 percent increase over the 2012 job base of 4.38 million jobs. Over this time period, the unemployment rate in Los Angeles County declined from a high of 12.5 percent in 2010 down to 4.7 percent in 2018.³⁴ During this time housing costs in higher cost cities and places have become even more costly, shifting demand to well-located close-in cities and places with relatively lower housing costs, such as Inglewood, as well as to more far-flung locations.³⁵

In summary, a number of local and regional factors appear to affect housing prices in Inglewood. However, there is no evidence directly connecting such increases to substantial housing displacement that would result in the need for construction of new housing. In addition, as discussed in Impact 3.12-2, no evidence in the record supports a conclusion that a new sports venue would indirectly contribute to such effects that would result in displacement of existing housing units or residents in such substantial numbers that the construction of new housing elsewhere would be necessitated. For the reasons described above, the contribution of the Proposed Project is less than cumulatively considerable and thus is considered **less than significant**.

Mitigation Measures

None required.

³² ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, pp. 33-39.

³³ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 32.

³⁴ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, p. 36.

³⁵ ALH Urban & Regional Economics, Inglewood Sports and Entertainment Venue Displacement Study, July 2019, pp. 36-39.